



505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038

May 15, 2020

**VIA E-FILING
PUBLIC DOCUMENT
TRADE SECRET INFORMATION HAS BEEN EXCISED**

Mr. Will Seuffert
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2116

Re: Petition of CenterPoint Energy Resources Corp, d/b/a CenterPoint Energy Minnesota Gas, for Approval of an Affiliated Interest Agreement Between CenterPoint Energy Minnesota Gas and Minnesota Limited
Docket Number G-008/AI-20-_____

Dear Mr. Seuffert:

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas ("Company"), hereby submits to the Minnesota Public Utilities Commission ("Commission") a petition requesting approval of the 2020 MBLSE Replacement Project contract between Company and Minnesota Limited, LLC.

The Company has designated selected information in this document as trade secret. The information meets the definition of trade secret in Minn. Stat. § 13.37, subd. 1(b), as follows: (1) the information was supplied by Company, the affected organization; (2) Company has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this document; and (3) the protected information contains contractual details that have not been previously released to the public, including names and prices, which derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

We have electronically filed this document with your office and the parties on the attached service list. If you have any questions regarding this matter, please contact me at 612-321-4606 or steven.clay@centerpointenergy.com.

Sincerely,

/s/

Steven C. Clay
Senior Counsel

Attachments

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

| | |
|-----------------|--------------|
| Katie Sieben | Chair |
| Valerie Means | Commissioner |
| Matt Schuerger | Commissioner |
| Joseph Sullivan | Commissioner |
| John Tuma | Commissioner |

In the Matter of a Petition by CenterPoint
Energy Minnesota Gas for Approval of an
Affiliated Interest Agreement with
Minnesota Limited

Docket No. G-008/AI-20-____

PETITION

I. Introduction

CenterPoint Energy Resources Corp, d/b/a CenterPoint Energy Minnesota Gas (the “Company” or “CenterPoint Energy Minnesota Gas”), submits this Petition to the Minnesota Public Utilities Commission (“Commission”) for approval of an Affiliated Interest Agreement between the Company and Minnesota Limited, LLC (“Minnesota Limited”). CenterPoint Energy Minnesota Gas is an operating division of CenterPoint Energy Resources Corp. which is a subsidiary of the holding company CenterPoint Energy, Inc. (“CenterPoint HoldCo”). Prior to April 9, 2020, and as detailed further below and in Docket No. G-008/AI-19-292 (the “2019 AI Docket”), Minnesota Limited was a non-regulated business of Vectren Infrastructure Services Company, a subsidiary of Vectren Corporation (“Vectren”). Vectren is a wholly owned subsidiary of CenterPoint HoldCo.

On April 17, 2020, Company and Minnesota Limited entered into a contract for pipeline rehabilitation, construction and installation work relative to the Company’s belt line system, entitled 2020 MBLSE Replacement Project (“Construction Contract”). On February 3, 2020, after the Company had issued its request for proposal (“RFP”) for the work included in the Construction Contract, but before awarding the Construction Contract to Minnesota Limited, CenterPoint HoldCo announced that it had entered into an agreement to sell Minnesota Limited to Power Team Services, LLC.¹ The sale of Minnesota Limited was consummated on April 9, 2020, and the Company and Minnesota Limited are no longer affiliates. However, since the Company committed to filing for approval of the Construction Contract in its Comments filed on April 2, 2020 in the 2019 AI Docket, the Company is filing this Petition.

¹The Company notified the Commission of the sale on February 5, 2020, in a letter filed in the 2019 AI docket.

The Company provides the following exhibits in support of its petition:

- Exhibit A – Summary
- Exhibit B – Construction Contract
- Exhibit C – Bid Sheet
- Exhibit D – Bid Recommendation

II. Information Required by Minn. Rule 7829.1300

Pursuant to Minn. Rule 7829.1300, the Company provides the following information:

a. Subpart 1. Summary of Filing

This petition requests Minnesota Public Utilities Commission approval of the Construction Contract. A one-paragraph summary is attached to this filing as Exhibit A pursuant to Minn. R. 7829.1300, subp.1.

b. Subpart 2. Service

Pursuant to Minn. R. pt. 7829.1300, subpart 2, the Company has served a copy of this filing on the Department of Commerce and the Office of the Attorney General – Residential Utilities and Antitrust Division. A summary of the filing has been served on all parties on the enclosed service list.

c. Subpart 3. Content of Filing Subject to Specific Requirements

i. Name, address and phone number of the utility:

CenterPoint Energy Minnesota Gas, a Division of CenterPoint Energy Resources Corp
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038
612-372-4664

ii. Name, address and phone number of the attorney for the utility:

Steven Clay
CenterPoint Energy Minnesota Gas, a Division of CenterPoint Energy Resources Corp
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038
612-321-4606

iii. Date of filing:

The date of this filing is May 15, 2020.

iv. Statute Controlling Schedule for Processing the Filing:

Minn. Stat. § 216B.48 and Minn. R. 7825.2200 (B) govern the substantive criteria related to the Construction Contract. These provisions do not establish an explicit timeframe for Commission action.

v. Utility Employee Responsible for Filing:

Steven C. Clay
Senior Counsel
CenterPoint Energy Minnesota Gas, a Division of CenterPoint Energy Resources Corp
505 Nicollet Mall
P.O. Box 59038
Minneapolis, MN 55459-0038
612-321-4606

III. Information Required by Minn. Stat. § 216B.48 and Minn. R. 7825.2200(B)

Pursuant to Minn. Stat. § 216B.48 and Minn. R. part 7825.2200(B) the Company provides the following information:

a. Heading

In the Matter of the Petition of CenterPoint Energy Minnesota Gas for Approval of an Affiliated Interest Agreement with Minnesota Limited.

b. Identity of the Affiliated Parties

CenterPoint Energy Resources Corp., d/b/a CenterPoint Energy Minnesota Gas and Minnesota Limited, LLC.

c. General Description of the Nature and Terms of the Agreement

The Construction Contract relates to services provided in connection with the Company's beltline replacement project. The Construction Contract was effective on April 17, 2020 and will expire on February 28, 2021.

The Construction Contract is part of the 2020 Metro Belt Line² construction project. The work to be performed includes all supervision, labor and equipment to install approximately 20,728 feet of pipe associated with four segments of large diameter steel main located in the Cities of Golden Valley, Crystal, New Hope, Edina and Fridley. Additional detailed description is included in the Scope section of the Construction Contract which is attached as Exhibit B.

d. A List of the Past History of All Current Contracts or Agreements Between the Petitioner and Affiliated Interest, the Consideration Received by the Affiliated Interest

i. List of Outstanding Contracts or agreements:

The Construction Contract is the only outstanding contract or agreement with Minnesota Limited.

ii. Consideration received by Affiliated Interest:

²The Metro Belt Line project is part of the Transmission Pipeline Replacement Project that is discussed in the current rate case (Docket No. G-008/GR-19-524). For additional information on the Transmission Pipeline Replacement Project, please see the testimony of Mr. Trey Kuchar starting at page 34 in Docket No. G-008/GR-19-524.

The total to be paid under this contract is estimated to be **[TRADE SECRET INFORMATION BEGINS...**

...TRADE SECRET INFORMATION ENDS.]

iii. Summary of Relevant Costs:

The estimated value of the Construction Contract, above, includes all supervision, labor and equipment to install large diameter high pressure steel pipe as well as various diameter low pressure steel pipe and below grade vaults. The estimated value also contains a contingency amount to cover potential cost overruns and unforeseen circumstances. Details concerning cost components are provided in the Unit Price section, pages 10 through 28, of the Construction Contract included as Exhibit B.

e. A Descriptive Summary of the Pertinent Facts and Reasons Why Such Contract or Agreement is in the Public Interest

Background

As discussed in Mr. Kuchar's testimony (in Docket No. G-008/GR-19-524), the Company's Transmission Integrity Management Plan ("TIMP") was developed to comply with the United States Department of Transportation, Pipeline and Hazardous Materials Safety Administration ("PHMSA") rules and requirements, and is updated continually as needed. One component of the Company's TIMP is the Transmission Pipeline Replacement Project which includes the repair or replacement of larger transmission line segments identified through the assessment process. Due to the critical nature of the work, it is necessary to use skilled workers to replace transmission pipe that was originally installed in the 1950s.

Reasons Why the Construction Contract is in the Public Interest

Minnesota Limited has worked on the Company's distribution system before as has been described in prior AI dockets, and is one of the largest transmission pipeline contractors in the region. Capital infrastructure investments have increased throughout the country in the natural gas and other industries, increasing the demand for qualified transmission and distribution pipeline contractor resources. It is in the public interest that the Company secure qualified and reliable resources to ensure completion of its critical pipeline replacement projects. Minnesota Limited has extensive experience in providing pipeline dig services to a wide variety of customers throughout the United States. These projects range from routine excavation, recoating,

backfill and remediation in a farm field to deep excavation in saturated wetland areas. Minnesota Limited also provides maintenance services for pipeline systems including valve maintenance, recoating, sleeving, line lowering, pipeline markers, anomaly investigation and right of way clearing.

As discussed below, a competitive bid process was used to select Minnesota Limited.

f. Amount of the Compensation and, if Applicable, a Brief Description of the Cost Allocation Methodology or Market Information Used to Determine Price

The exact total cost that will be incurred by CenterPoint Energy Minnesota Gas under the Construction Contract is not known at this time but is estimated to be **[TRADE SECRET INFORMATION BEGINS... ...TRADE SECRET INFORMATION ENDS]**.

The Company used a competitive bid process as described below to determine market pricing, as documented in Exhibit C. Consistent with accounting rules, the cost of the work done by Minnesota Limited will be capitalized and subject to review in a future rate case.

g. Whether Competitive Bidding was Used or an Explanation Why It was Not Used

CenterPoint Energy's Purchasing and Construction/Contract Services departments initiated a formal request for proposal process beginning with a pre-bid meeting on November 14, 2019. Six vendors representing a mix of local and national distribution pipeline companies serving the Midwest region were invited to bid. All invited bidders attended the pre-bid meeting and all initially committed to submitting bids. Ultimately three of the invited bidders offered bids.³ The three bidders that did not submit bids identified the inability to hire additional qualified and skilled labor and supervision to handle a project of this size as the primary reason for not bidding on the project.

In evaluating the submitted bids, design details were reviewed page by page as well as each phase of construction. The bid document enumerated project design specifications, including line item quantities and lump sum price requirements. **[TRADE SECRET INFORMATION BEGINS...**

...TRADE SECRET INFORMATION ENDS] the Company awarded the bid to Minnesota Limited. The award to Minnesota Limited allows the Company to be

³The Company asked one of the three bidders to resubmit its bid using the National Distribution Contract rate due to a wide variance between its initial bid and the other two bidders, resulting in the four bids included in Exhibit D.

prudent with capital dollars and gain pipeline construction capacity, assuring all planned capital construction projects can be completed on time and on plan in 2020.

h. Copy of the Contract or Agreement, or Modifications or Revisions of an Existing Contract or Agreement

A PUBLIC copy of the Construction Contract is attached as Exhibit B. Additionally, a PUBLIC copy of the bid sheet comparing costs between bidders is submitted as Exhibit C, and a PUBLIC copy of the Company's recommendation to select Minnesota Limited is attached as Exhibit D.

i. Whether the Affiliate Would Have Access to Customer Information, Such as Customer Name, Address, Usage or Demographic Information

The scope of work under the Construction Contract does not require that Minnesota Limited have access to customer information.

IV. Additional Requirements Pursuant to Commission Order Dated July 11, 1996, in Docket No. G-008/AI-96-37

a. Quantification of Cost Savings and Other Ratepayer Benefits

As discussed above, the exact cost amount of the Construction Contract is not known at this time.

As discussed above, the public interest, and therefore ratepayers, will benefit from the replacement of a portion of the transmission pipeline discussed above by Minnesota Limited. The work is an important component of the Company's integrity management program, yielding safety and reliability benefits. The competitive bidding process that was used to select Minnesota Limited also ensures that the associated cost is reasonable, providing ratepayer protections as well. Finally, the cost will be subject to review in the next general rate case.

b. Explanation of Changes Made to the Cost Allocation Manual ("CAM") or Reasons Why Changes are Not Necessary

The work subject to the Construction Contract is utility work in Minnesota and does not include work or costs related to the Company's non-regulated business lines. The Construction Contract will have no impact on the Company's CAM.

V. Additional Requirements Pursuant to Commission Order Dated December 30, 2020 in the 2019 AI Docket

In its Order in the 2019 AI Docket, the Commission ordered the Company to "propose improved procurement practices in future affiliated interest agreements." The Company is mindful of its obligation to be prudent with ratepayer dollars in all construction projects and has instituted several improvements to its procurement practices. These improvements include the following:

- The Company moved its RFP process to earlier in the year in order to compete more effectively for construction contractors.

- The Company reached out to six pipeline construction companies serving the Midwest and all six Companies attended the Company's pre-bid meeting, as opposed to five attendees in 2018 and three in 2019.
- The Company has used its best efforts to ensure that both primary work (Beltline) and emergent work (other large diameter steel pipeline projects) will be included in the scope of work in the RFP.
- In future construction seasons CenterPoint Energy will actively promote within both the National Pipeline Union and Distribution Pipeline Union the opportunity for contractors to become qualified to participate in an RFP process for Company constructions projects.

VI. CONCLUSION

For the above reasons, CenterPoint Energy Minnesota Gas respectfully requests that the Commission issue an order approving the Construction Contract between Minnesota Limited and CenterPoint Energy Minnesota Gas.

EXHIBIT A: ONE-PAGE SUMMARY

**STATE OF MINNESOTA
BEFORE THE
MINNESOTA PUBLIC UTILITIES COMMISSION**

| | |
|-----------------|--------------|
| Katie Sieben | Chair |
| Valerie Means | Commissioner |
| Matt Schuerger | Commissioner |
| Joseph Sullivan | Commissioner |
| John Tuma | Commissioner |

In the Matter of a Petition by CenterPoint
Energy Minnesota Gas for Approval of an
Affiliated Interest Agreement with
Minnesota Limited

Docket No. G-008/AI-20-____

ONE-PAGE SUMMARY

Please take notice that on May 13, 2020, CenterPoint Energy Resources Corp, d/b/a CenterPoint Energy Minnesota Gas, submitted a Petition to the Minnesota Public Utilities Commission seeking approval of an Affiliated Interest Agreement with Minnesota Limited, LLC.

On April 17, 2020, CenterPoint Energy Minnesota Gas and Minnesota Limited, LLC entered into a contract for pipeline rehabilitation, construction, and installation work relative to its Belt Line system. The contract was entered into after a competitive bidding process. The contract will conclude on February 28, 2021. On February 3, 2020, after the Company had issued its request for proposal (“RFP”) for the work included in the Construction Contract, but before awarding the Construction Contract to Minnesota Limited, CenterPoint Energy Inc. announced that it had entered into an agreement to sell Minnesota Limited to Power Team Services, LLC. The sale of Minnesota Limited was consummated on April 9, 2020, and the Company and Minnesota Limited are no longer affiliates. However, since the Company committed to filing for approval of the Construction Contract in its Comments filed on April 2, 2020, in Docket No. G-008/AI-19-292, the Company is filing this Petition.

Public Document

EXHIBIT B: CONTRACT

CenterPoint Energy Minnesota Gas has designated certain information as **[TRADE SECRET]**. The identified trade secret information meets the definition of trade secret information in Minn. Stat. § 13.37, subd.1(b), as follows:

- 1) the information was supplied by CenterPoint Energy Minnesota Gas, the affected organization;
- 2) CenterPoint Energy Minnesota Gas has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this proceeding; and
- 3) the protected information contains contractual details that have not been previously released to the public which derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

The public and non-public contents are so intertwined and interspersed throughout as to make the entire contract non-public.

The Contract has been excised in its entirety from the public version of this filing.

In accordance with Minn. Rule 7829.0500, Subp. 3, CenterPoint Energy furnishes the following description of the document:

Nature of the Material: *PDF, construction contract between the parties*

Author: *CenterPoint Energy*

General Import: *This is the contract that is the subject of this filing*

Date the Document was Prepared: *April 17, 2020*

Public Document

EXHIBIT C: BID SHEET

CenterPoint Energy Minnesota Gas has designated certain information as **[TRADE SECRET]**. The identified trade secret information meets the definition of trade secret information in Minn. Stat. § 13.37, subd.1(b), as follows:

- 1) the information was supplied by CenterPoint Energy Minnesota Gas, the affected organization;
- 2) CenterPoint Energy Minnesota Gas has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this proceeding; and
- 3) the protected information contains contractual details that have not been previously released to the public which derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

The public and non-public contents are so intertwined and interspersed throughout as to make the entire contract non-public.

The document has been excised in its entirety from the public version of this filing.

In accordance with Minn. Rule 7829.0500, Subp. 3, CenterPoint Energy furnishes the following description of the document:

Nature of the Material: *PDF, document comparing competitive bids received*

Author: *CenterPoint Energy*

General Import: *The document provides details concerning the competitive bidding process*

Date the Document was Prepared: *January 9, 2020*

Public Document

EXHIBIT D: BID RECOMMENDATION

CenterPoint Energy Minnesota Gas has designated certain information as **[TRADE SECRET]**. The identified trade secret information meets the definition of trade secret information in Minn. Stat. § 13.37, subd.1(b), as follows:

- 1) the information was supplied by CenterPoint Energy Minnesota Gas, the affected organization;
- 2) CenterPoint Energy Minnesota Gas has taken all reasonable efforts to maintain the secrecy of the information, including protecting it from disclosure in this proceeding; and
- 3) the protected information contains contractual details that have not been previously released to the public which derive independent economic value, actual or potential, from not being generally known to, and not being readily ascertainable by proper means by other persons who can obtain economic value from its disclosure or use.

The public and non-public contents are so intertwined and interspersed throughout as to make the entire contract non-public.

The document has been excised in its entirety from the public version of this filing.

In accordance with Minn. Rule 7829.0500, Subp. 3, CenterPoint Energy furnishes the following description of the document:

Nature of the Material: *PDF, document recommending acceptance of the Minnesota Limited bid*

Author: *CenterPoint Energy*

General Import: *The document lays out the reasoning behind the acceptance of the Minnesota Limited bid*

Date the Document was Prepared: *February 27, 2020*

CERTIFICATE OF SERVICE

Docket Number G-008/AI-20-_____

Melodee S. Carlson Chang, certifies she served the attached Affiliated Interest filing on all parties on the attached service list from Docket No. G-008/AI-19-292.

/s/ _____
Melodee S. Carlson Chang

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------|--|------------------------------------|---|--------------------|-------------------|-------------------------|
| David | Aafedt | daafedt@winthrop.com | Winthrop & Weinstine, P.A. | Suite 3500, 225 South Sixth Street Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| James J. | Bertrand | james.bertrand@stinson.com | STINSON LLP | 50 S 6th St Ste 2600 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Brenda A. | Bjorklund | brenda.bjorklund@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Melodee | Carlson Chang | melodee.carlsonchang@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Steven | Clay | Steven.Clay@CenterPointEnergy.com | CenterPoint Energy Minnesota Gas | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Generic Notice | Commerce Attorneys | commerce.attorneys@ag.state.mn.us | Office of the Attorney General-DOC | 445 Minnesota Street Suite 1400 St. Paul, MN 55101 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 280 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Edward | Garvey | garveyed@aol.com | Residence | 32 Lawton St Saint Paul, MN 55102 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Robert | Harding | robert.harding@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 55101 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Amber | Lee | Amber.Lee@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|----------------|--------------------------------|--------------------------------------|------------------------------------|--|--------------------|-------------------|-------------------------|
| Pam | Marshall | pam@energycents.org | Energy CENTS Coalition | 823 7th St E St. Paul, MN 55106 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| David | Moeller | dmoeller@allete.com | Minnesota Power | 30 W Superior St Duluth, MN 558022093 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Andrew | Moratzka | andrew.moratzka@stoel.com | Stoel Rives LLP | 33 South Sixth St Ste 4200 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Samantha | Norris | samanthanorris@alliantenergy.com | Interstate Power and Light Company | 200 1st Street SE PO Box 351 Cedar Rapids, IA 524060351 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Generic Notice | Residential Utilities Division | residential.utilities@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012131 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Will | Seuffert | Will.Seuffert@state.mn.us | Public Utilities Commission | 121 7th Pl E Ste 350 Saint Paul, MN 55101 | Electronic Service | Yes | OFF_SL_19-292_AI-19-292 |
| Janet | Shaddix Elling | jshaddix@janetshaddix.com | Shaddix And Associates | 7400 Lyndale Ave S Ste 190 Richfield, MN 55423 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| Peggy | Sorum | peggy.sorum@centerpointenergy.com | CenterPoint Energy | 505 Nicollet Mall Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| James M | Strommen | jstrommen@kennedy-graven.com | Kennedy & Graven, Chartered | 200 S 6th St Ste 470 Minneapolis, MN 55402 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |
| | | | | | | | |

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|-----------|-----------------------|----------------------|---|--------------------|-------------------|-------------------------|
| Eric | Swanson | eswanson@winthrop.com | Winthrop & Weinstine | 225 S 6th St Ste 3500 Capella Tower Minneapolis, MN 554024629 | Electronic Service | No | OFF_SL_19-292_AI-19-292 |